

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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GOVERNMENT EMPLOYEES  
INSURANCE COMPANY, GEICO  
GENERAL INSURANCE COMPANY,  
and GEICO INDEMNITY COMPANY  
Plaintiffs,

*Civil Action No.: 1:15-cv-13504*

vs.

BIG CITY CHIROPRACTIC &  
SPORTS INJURY, BRIAN ELIAS,  
D.C., MEGAN BRATTON, D.C.,  
KAREN DAVIS, PROFESSIONAL  
SOLUTIONS INC., AND PS  
FUNDING, LLC,  
Defendants.

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**DEFENDANTS' KAREN DAVIS**  
**ANSWER TO PLAINTIFF'S COMPLAINT**

Pursuant to the Federal Rules of Civil Procedure, Defendant Karen Davis responds to Plaintiff's Complaint.

**INTRODUCTION**

1. Denied.
2. Denied.
3. Denied.
4. Denied.
5. Denied.

- 6. Denied.
- 7. Denied.
- 8. Denied.
- 9. Denied.
- 10. Denied.

**PARTIES**

- 11. Admitted.
- 12. Admitted.
- 13. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 13 of Plaintiff's Complaint and call upon Plaintiff to prove same.
- 14. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 14 of Plaintiff's Complaint and call upon Plaintiff to prove same.
- 15. Admitted.
- 16. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16 of Plaintiff's Complaint and call upon Plaintiff to prove same.
- 17. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 17 of Plaintiff's Complaint and call upon Plaintiff to prove same.
- 18. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 18 of Plaintiff's Complaint and call upon Plaintiff to prove same.
- 19. Admitted.
- 20. Denied.

**JURISDICTON AND VENUE**

- 21. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 21 of Plaintiff's Complaint and call upon Plaintiff to prove same.
- 22. Denied.
- 23. Denied.
- 24. Denied.

**GEICO'S BUSINESS**

**A. Automobile Coverages Implicated.**

- 25. Denied.
- 26. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 26 of Plaintiff's Complaint and call upon Plaintiff to prove same.
- 27. Admitted.
- 28. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 28 of Plaintiff's Complaint and call upon Plaintiff to prove same.
- 29. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 29 of Plaintiff's Complaint and call upon Plaintiff to prove same.
- 30. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 30 of Plaintiff's Complaint and call upon Plaintiff to prove same.
- 31. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 31 of Plaintiff's Complaint and call upon Plaintiff to prove same.
- 32. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 32 of Plaintiff's Complaint and call upon Plaintiff to prove same.

33. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 33 of Plaintiff's Complaint and call upon Plaintiff to prove same.
34. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 34 of Plaintiff's Complaint and call upon Plaintiff to prove same.
35. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 35 of Plaintiff's Complaint and call upon Plaintiff to prove same.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**B. Impact of Defendants' Conduct on GEICO**

36. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 36 of Plaintiff's Complaint and call upon Plaintiff to prove same.
37. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 37 of Plaintiff's Complaint and call upon Plaintiff to prove same.
38. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 38 of Plaintiff's Complaint and call upon Plaintiff to prove same.
39. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 39 of Plaintiff's Complaint and call upon Plaintiff to prove same.
40. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 40 of Plaintiff's Complaint and call upon Plaintiff to prove same.
41. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 41 of Plaintiff's Complaint and call upon Plaintiff to prove same.
42. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 42 of Plaintiff's Complaint and call upon Plaintiff to prove same.

43. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 43 of Plaintiff's Complaint and call upon Plaintiff to prove same.
44. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 44 of Plaintiff's Complaint and call upon Plaintiff to prove same.
45. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 45 of Plaintiff's Complaint and call upon Plaintiff to prove same.
46. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 46 of Plaintiff's Complaint and call upon Plaintiff to prove same.
47. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 47 of Plaintiff's Complaint and call upon Plaintiff to prove same.
48. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 48 of Plaintiff's Complaint and call upon Plaintiff to prove same.
49. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 49 of Plaintiff's Complaint and call upon Plaintiff to prove same.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and pursuant to award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

## **V. DEFENDANTS' REFERRAL SCHEME**

### **A. Dr. Interstate Network.**

50. To the extent the allegations of paragraph 50 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
51. To the extent the allegations of paragraph 51 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said

allegations, and therefore denies said allegations and demand strict proof thereof.

52. To the extent the allegations of paragraph 52 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
53. To the extent the allegations of paragraph 53 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
54. To the extent the allegations of paragraph 54 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
55. To the extent the allegations of paragraph 55 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
56. To the extent the allegations of paragraph 56 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
57. To the extent the allegations of paragraph 57 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
58. To the extent the allegations of paragraph 58 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
59. To the extent the allegations of paragraph 59 of the Complaint are directed at Answering Defendant, Answering Defendant is without

knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

60. To the extent the allegations of paragraph 60 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
61. To the extent the allegations of paragraph 61 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
62. To the extent the allegations of paragraph 62 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
63. To the extent the allegations of paragraph 63 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
64. To the extent the allegations of paragraph 64 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
65. To the extent the allegations of paragraph 65 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**B. PS Funding Kickbacks and Money Laundering.**

66. Denied.

67. Denied.

68. Denied.

69. Denied.

70. Denied.

71. Denied.

72. Denied.

73. Denied.

74. Denied.

75. Denied.

76. Denied.

77. Denied.

78. Denied.

79. Denied.

80. Denied.

81. Denied.

82. Denied.

83. Denied.

84. Denied.

85. Denied.

86. Denied.

87. Denied.

88. Denied.



**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**C. Unlicensed "Professional" Legal Assistance.**

89. Denied.

90. Denied.

91. Denied.

92. Denied.

93. Denied.

94. Denied.

95. Denied.

96. Denied.

97. Denied.

98. Denied.

99. Denied.

100. Denied.

101. Denied.

102. Denied.

103. Denied.

104. Denied.

105. Denied.

106. Denied.

107. Denied.

108. Denied.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

## **VI. BIG CITY OCERUTILIZATION OF PRACTICE AND DECEIT**

### **A. Hiring and Instruction of Dr. Bratton.**

109. To the extent the allegations of paragraph 109 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

110. To the extent the allegations of paragraph 110 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

111. To the extent the allegations of paragraph 111 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

112. To the extent the allegations of paragraph 112 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

113. To the extent the allegations of paragraph 113 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said

allegations, and therefore denies said allegations and demand strict proof thereof.

114. To the extent the allegations of paragraph 114 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
115. To the extent the allegations of paragraph 115 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
116. To the extent the allegations of paragraph 116 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
117. To the extent the allegations of paragraph 117 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**B. Unlawful and Fraudulent Billing for Services of Unskilled Staff.**

**1. *Fraudulent and Deceptive Failure to Supervise Supportive Services By Unqualified Staff.***

118. To the extent the allegations of paragraph 118 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

119. To the extent the allegations of paragraph 119 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
120. To the extent the allegations of paragraph 120 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
121. To the extent the allegations of paragraph 121 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
122. To the extent the allegations of paragraph 122 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
123. To the extent the allegations of paragraph 123 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
124. To the extent the allegations of paragraph 124 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
125. To the extent the allegations of paragraph 125 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
126. To the extent the allegations of paragraph 126 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

127. To the extent the allegations of paragraph 127 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
128. To the extent the allegations of paragraph 128 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
129. To the extent the allegations of paragraph 129 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
130. To the extent the allegations of paragraph 130 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
131. To the extent the allegations of paragraph 131 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
132. To the extent the allegations of paragraph 132 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
133. To the extent the allegations of paragraph 133 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
134. To the extent the allegations of paragraph 134 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said

allegations, and therefore denies said allegations and demand strict proof thereof

135. To the extent the allegations of paragraph 135 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
136. To the extent the allegations of paragraph 136 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
137. To the extent the allegations of paragraph 137 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
138. To the extent the allegations of paragraph 138 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
139. To the extent the allegations of paragraph 139 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
140. To the extent the allegations of paragraph 140 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and

attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**2. *Unlawful Delegation of Physical Therapy to Unskilled Staff Members.***

141. To the extent the allegations of paragraph 141 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
142. To the extent the allegations of paragraph 142 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
143. To the extent the allegations of paragraph 143 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
144. To the extent the allegations of paragraph 144 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
145. To the extent the allegations of paragraph 145 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
146. To the extent the allegations of paragraph 146 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
147. To the extent the allegations of paragraph 147 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said

allegations, and therefore denies said allegations and demand strict proof thereof

148. To the extent the allegations of paragraph 148 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
149. To the extent the allegations of paragraph 149 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
150. To the extent the allegations of paragraph 150 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
151. To the extent the allegations of paragraph 151 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
152. To the extent the allegations of paragraph 152 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
153. To the extent the allegations of paragraph 153 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
154. To the extent the allegations of paragraph 154 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
155. To the extent the allegations of paragraph 155 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said



allegations, and therefore denies said allegations and demand strict proof thereof

156. To the extent the allegations of paragraph 156 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
157. To the extent the allegations of paragraph 157 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
158. To the extent the allegations of paragraph 158 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
159. To the extent the allegations of paragraph 159 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
160. To the extent the allegations of paragraph 160 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
161. To the extent the allegations of paragraph 161 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
162. To the extent the allegations of paragraph 162 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
163. To the extent the allegations of paragraph 163 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said

allegations, and therefore denies said allegations and demand strict proof thereof

164. To the extent the allegations of paragraph 164 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
165. To the extent the allegations of paragraph 165 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
166. To the extent the allegations of paragraph 166 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
167. To the extent the allegations of paragraph 167 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
168. To the extent the allegations of paragraph 168 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
169. To the extent the allegations of paragraph 169 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
170. To the extent the allegations of paragraph 170 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
171. To the extent the allegations of paragraph 171 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said

allegations, and therefore denies said allegations and demand strict proof thereof

172. To the extent the allegations of paragraph 172 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
173. To the extent the allegations of paragraph 173 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
174. To the extent the allegations of paragraph 174 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
175. To the extent the allegations of paragraph 175 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
176. To the extent the allegations of paragraph 176 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
177. To the extent the allegations of paragraph 177 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
178. To the extent the allegations of paragraph 178 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
179. To the extent the allegations of paragraph 179 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said

allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

***C. Fraudulent Recordkeeping***

180. To the extent the allegations of paragraph 180 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

181. To the extent the allegations of paragraph 181 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

182. To the extent the allegations of paragraph 182 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

183. To the extent the allegations of paragraph 183 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**1. False Certification.**

184. To the extent the allegations of paragraph 184 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
185. To the extent the allegations of paragraph 185 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
186. To the extent the allegations of paragraph 186 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
187. To the extent the allegations of paragraph 187 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
188. To the extent the allegations of paragraph 188 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
189. To the extent the allegations of paragraph 189 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
190. To the extent the allegations of paragraph 190 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

191. To the extent the allegations of paragraph 191 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
192. To the extent the allegations of paragraph 192 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
193. To the extent the allegations of paragraph 193 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

***2. Up-coding of Unskilled Exercise Assistance.***

194. To the extent the allegations of paragraph 194 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
195. To the extent the allegations of paragraph 195 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
196. To the extent the allegations of paragraph 196 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

197. To the extent the allegations of paragraph 197 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
198. To the extent the allegations of paragraph 198 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
199. To the extent the allegations of paragraph 199 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
200. To the extent the allegations of paragraph 200 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
201. To the extent the allegations of paragraph 201 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
202. To the extent the allegations of paragraph 202 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
203. To the extent the allegations of paragraph 203 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
204. To the extent the allegations of paragraph 204 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

205. To the extent the allegations of paragraph 205 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
206. To the extent the allegations of paragraph 206 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
207. To the extent the allegations of paragraph 207 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
208. To the extent the allegations of paragraph 208 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
209. To the extent the allegations of paragraph 209 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
210. To the extent the allegations of paragraph 210 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
211. To the extent the allegations of paragraph 211 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
212. To the extent the allegations of paragraph 212 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof



213. To the extent the allegations of paragraph 213 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
214. To the extent the allegations of paragraph 214 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
215. To the extent the allegations of paragraph 215 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
216. To the extent the allegations of paragraph 216 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
217. To the extent the allegations of paragraph 217 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
218. To the extent the allegations of paragraph 218 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
219. To the extent the allegations of paragraph 219 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
220. To the extent the allegations of paragraph 220 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

- 221. To the extent the allegations of paragraph 221 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 222. To the extent the allegations of paragraph 222 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 223. To the extent the allegations of paragraph 223 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 224. To the extent the allegations of paragraph 224 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 225. To the extent the allegations of paragraph 225 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

## VII. ALLEGATIONS CONCERNING SPECIFIC INSURANCE CLAIMS

226. Denied.

227. Denied.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**A. Claimant: M.C.; GEICO Claim No.: 052776160101018; Date of Loss: December 7, 2014.**

228. To the extent the allegations of paragraph 228 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

229. To the extent the allegations of paragraph 229 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

230. Denied.

231. Denied.

232. Denied.

233. To the extent the allegations of paragraph 233 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

234. To the extent the allegations of paragraph 234 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

235. To the extent the allegations of paragraph 235 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
236. To the extent the allegations of paragraph 236 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
237. To the extent the allegations of paragraph 237 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
238. To the extent the allegations of paragraph 238 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
239. To the extent the allegations of paragraph 239 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
240. To the extent the allegations of paragraph 240 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
241. To the extent the allegations of paragraph 241 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
242. To the extent the allegations of paragraph 242 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

243. To the extent the allegations of paragraph 243 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**B. Claimant: C.G.; GEICO Claim No.: 0502776160101018; Date of Loss: December 7, 2014.**

244. To the extent the allegations of paragraph 244 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
245. To the extent the allegations of paragraph 245 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
246. To the extent the allegations of paragraph 246 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
247. To the extent the allegations of paragraph 247 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
248. To the extent the allegations of paragraph 248 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said

allegations, and therefore denies said allegations and demand strict proof thereof

249. To the extent the allegations of paragraph 249 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
250. To the extent the allegations of paragraph 250 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
251. To the extent the allegations of paragraph 251 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
252. To the extent the allegations of paragraph 252 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**C. Claimant: F.J.; GEICO Claim No.: 0383928010101012; Date of Loss: November 15, 2014.**

253. To the extent the allegations of paragraph 253 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

254. To the extent the allegations of paragraph 254 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
255. To the extent the allegations of paragraph 254 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
256. To the extent the allegations of paragraph 255 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
257. To the extent the allegations of paragraph 256 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
258. To the extent the allegations of paragraph 257 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
259. To the extent the allegations of paragraph 258 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
260. To the extent the allegations of paragraph 259 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
261. To the extent the allegations of paragraph 260 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

262. To the extent the allegations of paragraph 261 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
263. To the extent the allegations of paragraph 262 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and pursuant to G.L. chapter 231, section 6F, award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**D. Claimant: G.S.; GEICO Claim No.: 0503722320101042; Date of Loss: February 4, 2015.**

264. To the extent the allegations of paragraph 263 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
265. To the extent the allegations of paragraph 264 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
266. To the extent the allegations of paragraph 265 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
267. To the extent the allegations of paragraph 266 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof



268. To the extent the allegations of paragraph 267 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
269. To the extent the allegations of paragraph 268 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
270. To the extent the allegations of paragraph 269 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
271. To the extent the allegations of paragraph 270 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
272. To the extent the allegations of paragraph 271 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
273. To the extent the allegations of paragraph 272 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
274. To the extent the allegations of paragraph 273 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and pursuant to G.L. chapter 231, section 6F,

award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**E. Claimant: A.W.; GEICO Claim No.: 0525131450101018; Date of Loss: March 14, 2015.**

- 275. To the extent the allegations of paragraph 274 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 276. To the extent the allegations of paragraph 275 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 277. To the extent the allegations of paragraph 276 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 278. To the extent the allegations of paragraph 277 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 279. To the extent the allegations of paragraph 278 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 280. To the extent the allegations of paragraph 279 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 281. To the extent the allegations of paragraph 280 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

282. To the extent the allegations of paragraph 281 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
283. To the extent the allegations of paragraph 282 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
284. To the extent the allegations of paragraph 283 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and pursuant to G.L. chapter 231, section 6F, award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**F. Claimant: D.S.; GEICO Claim No.: 040307051010112; Date of Loss: March 15, 2015.**

285. To the extent the allegations of paragraph 284 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
286. To the extent the allegations of paragraph 285 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
287. To the extent the allegations of paragraph 286 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said

allegations, and therefore denies said allegations and demand strict proof thereof

288. To the extent the allegations of paragraph 287 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
289. To the extent the allegations of paragraph 288 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
290. To the extent the allegations of paragraph 289 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
291. To the extent the allegations of paragraph 290 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
292. To the extent the allegations of paragraph 291 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
293. To the extent the allegations of paragraph 292 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
294. To the extent the allegations of paragraph 293 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and pursuant to G.L. chapter 231, section 6F, award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**G. Claimant: J.A.; GEICO Claim No.: 0427237950101033; Date of Loss: April 14, 2015.**

- 295. To the extent the allegations of paragraph 294 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 296. To the extent the allegations of paragraph 295 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 297. To the extent the allegations of paragraph 296 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 298. To the extent the allegations of paragraph 297 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 299. Denied.
- 300. Denied.
- 301. Denied.
- 302. Denied.

303. To the extent the allegations of paragraph 302 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
304. To the extent the allegations of paragraph 303 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
305. To the extent the allegations of paragraph 304 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
306. To the extent the allegations of paragraph 305 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
307. To the extent the allegations of paragraph 306 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
308. To the extent the allegations of paragraph 307 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
309. To the extent the allegations of paragraph 308 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**H. Claimant: L.A.; GEICO Claim No.: 0468312910101025; Date of Loss: October 21, 2014.**

- 310. To the extent the allegations of paragraph 309 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 311. To the extent the allegations of paragraph 310 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 312. To the extent the allegations of paragraph 311 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 313. To the extent the allegations of paragraph 312 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 314. To the extent the allegations of paragraph 313 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 315. To the extent the allegations of paragraph 314 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

316. To the extent the allegations of paragraph 315 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
317. To the extent the allegations of paragraph 316 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
318. To the extent the allegations of paragraph 317 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
319. To the extent the allegations of paragraph 318 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**I. Claimant: A.J.M.; GEICO Claim No.: 0515706760101022; Date of Loss: January 8, 2015.**

320. To the extent the allegations of paragraph 319 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
321. To the extent the allegations of paragraph 320 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof



322. To the extent the allegations of paragraph 321 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
323. To the extent the allegations of paragraph 322 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
324. To the extent the allegations of paragraph 323 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
325. To the extent the allegations of paragraph 324 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
326. To the extent the allegations of paragraph 325 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
327. To the extent the allegations of paragraph 326 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
328. To the extent the allegations of paragraph 327 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
329. To the extent the allegations of paragraph 328 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**J. Claimant: A.S.; GEICO Claim No.: 0491205440101047; Date of Loss: December 12, 2014.**

- 330. To the extent the allegations of paragraph 329 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 331. To the extent the allegations of paragraph 330 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 332. To the extent the allegations of paragraph 331 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 333. To the extent the allegations of paragraph 332 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 334. To the extent the allegations of paragraph 333 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 335. To the extent the allegations of paragraph 334 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

336. To the extent the allegations of paragraph 335 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
337. To the extent the allegations of paragraph 336 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
338. To the extent the allegations of paragraph 337 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
339. To the extent the allegations of paragraph 338 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**K. Claimant: D.S.; GEICO Claim No.: 0503722320101059; Date of Loss: February 13, 2015.**

340. To the extent the allegations of paragraph 339 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
341. To the extent the allegations of paragraph 340 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

342. To the extent the allegations of paragraph 341 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
343. To the extent the allegations of paragraph 342 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
344. To the extent the allegations of paragraph 343 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
345. To the extent the allegations of paragraph 344 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
346. To the extent the allegations of paragraph 345 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
347. To the extent the allegations of paragraph 346 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
348. To the extent the allegations of paragraph 347 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
349. To the extent the allegations of paragraph 348 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

350. To the extent the allegations of paragraph 349 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**L. Claimant: S.A.; GEICO Claim No.: 0420212310101046; Date of Loss: February 8, 2015.**

351. To the extent the allegations of paragraph 350 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
352. To the extent the allegations of paragraph 351 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
353. To the extent the allegations of paragraph 352 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
354. To the extent the allegations of paragraph 353 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

- 355. To the extent the allegations of paragraph 354 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 356. To the extent the allegations of paragraph 355 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 357. To the extent the allegations of paragraph 356 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 358. To the extent the allegations of paragraph 357 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 359. To the extent the allegations of paragraph 358 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 360. To the extent the allegations of paragraph 359 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**M. Claimant: T.P.H.; GEICO Claim No.: 0497643830101025; Date of Loss: March 16, 2015.**

361. To the extent the allegations of paragraph 360 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
362. To the extent the allegations of paragraph 361 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
363. To the extent the allegations of paragraph 362 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
364. To the extent the allegations of paragraph 363 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
365. To the extent the allegations of paragraph 364 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
366. To the extent the allegations of paragraph 365 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
367. To the extent the allegations of paragraph 366 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

368. To the extent the allegations of paragraph 367 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
369. To the extent the allegations of paragraph 368 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
370. To the extent the allegations of paragraph 369 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
371. To the extent the allegations of paragraph 370 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
372. To the extent the allegations of paragraph 371 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
373. To the extent the allegations of paragraph 372 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
374. To the extent the allegations of paragraph 373 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
375. To the extent the allegations of paragraph 374 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.



**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

N. **Claimant: B.S.; GEICO Claim No.: 0484070640101018; Date of Loss: August 14, 2014.**

- 376. To the extent the allegations of paragraph 375 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 377. To the extent the allegations of paragraph 376 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 378. To the extent the allegations of paragraph 377 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 379. To the extent the allegations of paragraph 378 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 380. To the extent the allegations of paragraph 379 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 381. To the extent the allegations of paragraph 380 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

382. To the extent the allegations of paragraph 381 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
383. To the extent the allegations of paragraph 382 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
384. To the extent the allegations of paragraph 383 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**O. Claimant: N.F.; GEICO Claim No.: 0500514330101036; Date of Loss: November 22, 2014.**

385. To the extent the allegations of paragraph 384 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
386. To the extent the allegations of paragraph 385 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
387. To the extent the allegations of paragraph 386 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

388. To the extent the allegations of paragraph 387 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
389. To the extent the allegations of paragraph 388 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
390. To the extent the allegations of paragraph 389 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
391. To the extent the allegations of paragraph 390 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
392. To the extent the allegations of paragraph 391 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
393. To the extent the allegations of paragraph 392 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
394. To the extent the allegations of paragraph 393 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**P. Claimant: S.R.; GEICO Claim No.: 052776160101018; Date of Loss: December 7, 2014.**

- 395. To the extent the allegations of paragraph 394 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 396. To the extent the allegations of paragraph 395 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 397. To the extent the allegations of paragraph 396 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 398. To the extent the allegations of paragraph 397 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 399. To the extent the allegations of paragraph 398 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
- 400. To the extent the allegations of paragraph 399 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

401. To the extent the allegations of paragraph 400 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
402. To the extent the allegations of paragraph 401 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
403. To the extent the allegations of paragraph 402 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
404. To the extent the allegations of paragraph 403 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
405. To the extent the allegations of paragraph 404 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

**WHEREFORE**, Defendant states that Plaintiff's Complaint should be dismissed and that judgment should enter for Defendant and award Defendant her reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

## **VIII. CAUSES OF ACTION**

### **COUNT I: VIOLATIONS OF 18 U.S.C. § 1962(c) (BIG CITY ENTERPRISE) (Against Dr. Elias, Dr. Bratton, and Ms. Davis)**

406. Denied.
407. To the extent the allegations of paragraph 406 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
408. To the extent the allegations of paragraph 407 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
409. To the extent the allegations of paragraph 408 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
410. To the extent the allegations of paragraph 409 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
411. Denied.
412. Denied.
413. To the extent the allegations of paragraph 412 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
414. To the extent the allegations of paragraph 413 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

415. To the extent the allegations of paragraph 414 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
416. To the extent the allegations of paragraph 415 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
417. To the extent the allegations of paragraph 416 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
418. Denied.
419. To the extent the allegations of paragraph 418 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
420. Denied.
421. Denied.
422. Denied.
423. Paragraph 422 of the Complaint sets forth legal conclusions to which no response is required. To the extent a response is deemed necessary, Answering Defendant admits only to those duties imposed by law. Answering Defendant denies the remaining allegations in paragraph 422 of the Complaint and demand strict proof thereof.
424. Paragraph 423 of the Complaint sets forth legal conclusions to which no response is required. To the extent a response is deemed necessary, Answering Defendant admits only to those duties imposed by law. Answering Defendant denies the remaining allegations in paragraph 423 of the Complaint and demand strict proof thereof.

425. Paragraph 424 of the Complaint sets forth legal conclusions to which no response is required. To the extent a response is deemed necessary, Answering Defendant admits only to those duties imposed by law. Answering Defendant denies the remaining allegations in paragraph 424 of the Complaint and demand strict proof thereof.
426. Denied.
427. Denied.
428. Denied.
429. Denied.
430. Denied.
431. Denied.
432. Denied.
433. Denied.
434. Denied.
435. Denied.
436. Denied.
437. Denied.
438. Denied.
439. Denied.
440. Denied.
441. Denied.
442. Denied.
443. Denied.
444. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 443 of Plaintiff's Complaint and call upon Plaintiff to prove same.



445. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 444 of Plaintiff's Complaint and call upon Plaintiff to prove same.

446. Denied.

**WHEREFORE**, Defendant prays that this Honorable Court will enter judgment in her favor and against Plaintiffs on Count I of the Complaint, and award Defendants their reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**COUNT II: VIOLATIONS OF 18 U.S.C. § 1962(d)  
(BIG CITY CONSPIRACY)  
(Against Dr. Elias, Dr. Bratton and Ms. Davis)**

447. Denied.

448. Denied.

449. Denied.

450. Denied.

451. Denied.

452. Denied.

453. To the extent the allegations of paragraph 452 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

454. Denied.

**WHEREFORE**, Defendant prays that this Honorable Court will enter judgment in her favor and against Plaintiffs on Count II of the Complaint, and award Defendants their reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**COUNT III: VIOLATIONS OF 18 U.S.C. § 1962(c)  
(ASSOCIATION-IN-FACT ENTERPRISE)  
(Against All Defendants)**

455. Denied.

456. Denied.

457. Defendant denies any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 456 of Plaintiff's Complaint and call upon Plaintiff to prove same.

458. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 457 of Plaintiff's Complaint and call upon Plaintiff to prove same.

459. To the extent the allegations of paragraph 458 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

460. Denied.

461. Paragraph 460 of the Complaint sets forth legal conclusions to which no response is required. To the extent a response is deemed necessary, Answering Defendant admits only to those duties imposed by law. Answering Defendant denies the remaining allegations in paragraph 460 of the Complaint and demand strict proof thereof.

462. Denied.

463. Denied.

464. Denied.

465. Paragraph 464 of the Complaint sets forth legal conclusions to which no response is required. To the extent a response is deemed necessary, Answering Defendant admits only to those duties imposed by law. Answering Defendant denies the remaining allegations in paragraph 464 of the Complaint and demand strict proof thereof.
466. Denied.
- 467.
468. Denied.
469. Denied.
470. Denied.
471. Denied.
472. To the extent the allegations of paragraph 470 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
473. To the extent the allegations of paragraph 471 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
474. Denied.

**WHEREFORE**, Defendant prays that this Honorable Court will enter judgment in her favor and against Plaintiffs on Count III of the Complaint, and pursuant to G.L. c award Defendants their reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**COUNT IV: VIOLATIONS OF 18 U.S.C. § 1962(d)  
(ASSOCIATION-IN-FACT ENTERPRISE CONSPIRACY)  
(Against All Defendants)**

475. Denied.

476. Denied.

477. Denied.

478. Denied.

479. Denied.

480. Denied.

481. Denied.

**WHEREFORE**, Defendant prays that this Honorable Court will enter judgment in her favor and against Plaintiffs on Count IV of the Complaint, and award Defendants their reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**COUNT V: DECLARATORY RELIEF UNDER  
28 U.S.C. § 2201 DECLARATORY JUDGMENT ACT  
(Against Big City, Dr. Elias, and Dr. Bratton)**

482. Denied.

483. To the extent the allegations of paragraph 481 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

484. To the extent the allegations of paragraph 482 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof

485. To the extent the allegations of paragraph 483 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
486. To the extent the allegations of paragraph 484 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
487. To the extent the allegations of paragraph 485 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof
488. To the extent the allegations of paragraph 486 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant prays that this Honorable Court will enter judgment in her favor and against Plaintiffs on Count V of the Complaint, and award Defendants their reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith..

**COUNT VI: COMMON LAW FRAUD  
(Against Big City, Dr. Elias, and Dr. Bratton)**

489. Denied.
490. To the extent the allegations of paragraph 488 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
491. Denied.
492. Denied.

493. Denied.

494. Denied.

495. Denied.

**WHEREFORE**, Defendant prays that this Honorable Court will enter judgment in her favor and against Plaintiffs on Count VI of the Complaint, and award Defendants their reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**COUNT VII: CIVIL CONSPIRACY (Against All Defendants)**

496. Denied.

497. Denied.

498. Denied.

499. Denied.

**WHEREFORE**, Defendant prays that this Honorable Court will enter judgment in her favor and against Plaintiffs on Count VII of the Complaint, and award Defendants their reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**COUNT VIII: MONEY HAD AND RECEIVED (Against Big City)**

500. To the extent the allegations of paragraph 498 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

501. To the extent the allegations of paragraph 499 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
502. To the extent the allegations of paragraph 500 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
503. To the extent the allegations of paragraph 501 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
504. To the extent the allegations of paragraph 502 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.
505. To the extent the allegations of paragraph 503 of the Complaint are directed at Answering Defendant, Answering Defendant is without knowledge or information sufficient to form a belief concerning said allegations, and therefore denies said allegations and demand strict proof thereof.

**WHEREFORE**, Defendant prays that this Honorable Court will enter judgment in her favor and against Plaintiffs on Count VIII of the Complaint, and award Defendants their reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**COUNT IX: VIOLATIONS OF MASSACHUSETTS  
GENERAL LAWS CHAPTER 93A  
(Against All Defendants)**

506. Denied.
507. Denied.

508. Denied.

509. Denied.

510. Denied.

511. Denied.

512. Denied.

513. Denied.

514. Denied.

515. Denied.

516. Denied.

517. Denied.

518. Denied.

519. Denied.

520. Denied.

**WHEREFORE**, Defendant prays that this Honorable Court will enter judgment in her favor and against Plaintiffs on Count IX of the Complaint, and award Defendants their reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**COUNT X: INTENTIONAL INTERFERENCE WITH  
ADVANTAGEOUS BUSINESS RELATIONSHIPS  
(Against All Defendants)**

521. Denied.

522. Denied.

523. Denied.



**WHEREFORE**, Defendant prays that this Honorable Court will enter judgment in her favor and against Plaintiffs on Count X of the Complaint, and award Defendants their reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

### **AFFIRMATIVE DEFENSES**

#### **FIRST AFFIRMATIVE DEFENSE**

And further answering, the Defendant says that if the Plaintiffs proves that the Defendant was at fault as alleged, the Plaintiff was at fault to a greater degree than the Defendant and is barred from recovery.

#### **SECOND AFFIRMATIVE DEFENSE**

And further answering, the Defendant says that the Plaintiffs recovery, if any, must be diminished by the proportion of fault which is applicable to the Plaintiff.

#### **THIRD AFFIRMATIVE DEFENSE**

And further answering, Defendant says that Plaintiffs has failed to state a claim upon which relief can be granted and Plaintiff's Complaint should be dismissed pursuant to Mass. R. Civ. P. 12(b)(6).

**FOURTH AFFIRMATIVE DEFENSE**

By way of an affirmative defense, the Defendant states that the conduct of the Defendants were not the proximate cause of any injury or damage if at all sustained by the Plaintiff.

**FIFTH AFFIRMATIVE DEFENSE**

And further answering, in the event that it is judicially determined that Plaintiff sustained injuries and damages as alleged, all of which is specifically denied, then the injuries or damages were proximately caused by the intervening and superseding act of other parties or third persons over whom Defendant had no control or right of control and for whose actions Defendant is not liable.

**SIXTH AFFIRMATIVE DEFENSE**

And further answering, Defendant says that to the extent that it had any obligations to Plaintiff, such obligations have been fully, completely and properly performed in every respect.

**SEVENTH AFFIRMATIVE DEFENSE**

And further answering, Defendant says that any alleged acts/omissions supporting liability it may have committed or omitted, which Defendant denies, were superseded and/or replaced by the conduct of third persons.

**EIGHTH AFFIRMATIVE DEFENSE**

And further answering, Defendant says that Plaintiffs have failed to mitigate his damages, wherefore any damages awarded must be reduced by the degree of that failure to mitigate.

**NINTH AFFIRMATIVE DEFENSE**

And further answering, Defendant says that the alleged acts or omissions, if any, of Defendant was not the proximate cause of any damages alleged to have been suffered by Plaintiff.

**TENTH AFFIRMATIVE DEFENSE**

And further answering, the Defendant Karen Davis states that he can not be held individually liable for the acts or omissions of a corporation.

**WHEREFORE**, Defendant prays that this Honorable Court will enter judgment in her favor and against Plaintiffs of the Complaint, and award Defendants their reasonable costs and attorneys' fees for defending an action that is wholly insubstantial, frivolous, and not advanced in good faith.

**JURY DEMAND**

Defendants demand a trial by jury.

**KAREN DAVIS'S COUNTERCLAIM AGAINST GOVERNMENT EMPLOYEES INSURANCE COMPANY, GEICO GENERAL INSURANCE COMPANY, and GEICO INDEMNITY COMPANY**

Defendant/Plaintiff-in-Counterclaim re-state and incorporate by reference the allegations contained in the previous paragraphs.

***COUNTERCLAIM***

1. Defendant/Plaintiff in Counterclaim Keren Davis is an individual residing at 79 Kenwood Street, #1, Dorchester Center, MA 02124.
2. Plaintiff/Defendant in Counterclaim, Government Employees Insurance Company has a principal place of business at 5260 Western Avenue, Chevy Chase, Montgomery County, Maryland.
3. Plaintiff/Defendant in Counterclaim Government Employees Insurance Company is the parent of subsidiary business entities that underwrite insurance policies in the Commonwealth of Massachusetts, including GEICO General Insurance Company, and GEICO Indemnity Company. Collectively, Government Employees Insurance Company and these entities are referred to herein as "GEICO." GEICO has offices, among other places, in Massachusetts.

**COUNT ONE**

**Defamation of Character**

(Karen Davis v. Government Employees Insurance Company)

Defendant/Plaintiff in Counterclaim repeats and re-alleges the allegations of paragraph 1-3 through 3 of this Counterclaim and incorporates them herein by reference.

1. On information and belief, on or about October 2013, GEICO stated filed a insubstantial, frivolous and not advanced in good faith suit against Ms. Davis. GEICO made asserting that Ms. Davis engaged in a scheme with Brian Elias, D.C. ("Dr. Elias") and Megan Bratton, D.C. ("Dr. Bratton") designed to defraud GEICO along with other casualty insures in the following manner: advertising of payment of kickbacks through PS Funding, encouraging patients to cooperating with unreasonable and unnecessary treatment of chiropractic practice through Big City and submitting false and deceptive bills and records; and unauthorized practice of law.

2. These defamatory statements were also published in the Boston Globe. These statements defamed Ms. Davis and damaged her reputation in its trade or business.
3. As a direct result of GEICO defamation of MS. Davis, MS. Davis has suffered substantial monetary damages.

**WHEREFORE**, Defendant/Plaintiff-in-Counterclaim requests an award of damages together with the full amount of attorney's fees, costs and expenses for the defense of this lawsuit and interest thereon, as well as its attorney's fees, costs and expenses for maintaining the instant action, and interest thereon, and such other relief as this Honorable Court deems proper under the circumstances.

## **COUNT TWO**

### **Intentional And Wrongful Interference With Ms. Karen Davis's Contractual And Advantageous Business Relationships**

(Karen Davis v. Government Employees Insurance Company)

Defendant/Plaintiff-in-Counterclaim re-state and incorporate by reference the allegations contained in the previous paragraphs.

4. Ms. Davis had a business relationship with two law firms where she was retained as a paralegal on per diem status to provide legal assistance in various legal projects.
5. GEICO had knowledge of these relationships.
6. GEICO made statements to clients who Ms. Davis assisted in the capacity of a paralegal and made statements that were published in the Boston Globe with the intent to breach her relationships with clients and supervising attorneys.

7. GEICO was not privileged to induce any breach because the statements its made regarding Ms Davis are wholly insubstantial, frivolous, and not advanced in good faith.
8. Since GEICO began the investigation of these claims, Ms. Davis's business relationship with several attorneys has been breached. Specifically, Ms. Davis contract as a paralegal on per diem status and/or project base assignment have been terminated.
9. Ms. Davis has suffered wage loss since the breach occurred.

**WHEREFORE,** Defendants/Plaintiffs-in-Counterclaim request an award of damages together with the full amount of attorney's fees, costs and expenses for the defense of this lawsuit and interest thereon, as well as its attorney's fees, costs and expenses for maintaining the instant action, and interest thereon, and such other relief as this Honorable Court deems proper under the circumstances.

**JURY DEMAND**

Karen Davis demands a trial by jury on all issues so triable.

Respectfully submitted,  
Defendant Karen Davis,  
By her attorney,

/s/ Rudolph F. Miller  
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**CERTIFICATE OF SERVICE**

The undersigned, counsel for Rudolph F. Miller hereby certifies that a copy of the foregoing pleading was served upon all counsel of record by electronic filing on this 3<sup>rd</sup> day of November 2015.

/s/RFM  
Rudolph F. Miller, Esq.